

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- x

UNITED STATES OF AMERICA,

-against-

KARL JORDAN, JR., et al.,

**NOTICE OF PRETRIAL  
MOTIONS FOR  
DEFENDANT  
KARL JORDAN, JR.**

20 Cr. 305 (LDH)

Defendants.

----- x

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, dated June 17, 2022 and upon all prior proceedings held herein, defendant, Karl Jordan, Jr., moves before the Honorable LaShann DeArcy Hall, United States District Judge, at the United States Courthouse for the Eastern District of New York, for the following relief, orders:

- 1) suppressing all data obtained from Mr. Jordan's phones and all fruits of the poisonous tree regarding the government's investigation; and
- 2) suppressing Mr. Jordan's post-arrest statement.

Mr. Jordan also requests leave to join in his co-defendant's motions to the extent they are beneficial to his defense and such other and further relief as the Court may deem just and proper.

Dated: Brooklyn, New York  
June 17, 2022

Respectfully submitted,

/s/  
\_\_\_\_\_  
MICHAEL HUESTON, ESQ.  
16 Court Street, 35<sup>th</sup> Floor  
Brooklyn, New York 11241  
(718) 246-2900

MARK S. DEMARCO, ESQ.  
Attorney at Law  
3867 East Tremont Avenue  
Bronx, New York 10465  
(718) 239-7070

JOHN A. DIAZ, ESQ.  
DIAZ & MOSKOWITZ, PLLC.  
225 Broadway, Suite 715  
New York, NY 10007  
212-227-8208

MONICA NEJATHAIM, ESQ.  
Fischetti & Malgieri LLP  
565 5th Avenue, 7th Floor  
New York, New York 10017  
(212) 593-7100

*Counsel for Karl Jordan, Jr.*

To: Counsel of Record